

**MEMO ENDORSED**



**Balance Law Firm**

Telephone: +1(212) 741-8080  
Facsimile: +1(646) 558-4889  
<https://balancelawfirm.com>

One World Trade Ctr Ste 8500  
New York, NY 10007-0089  
DC, CT, NJ, MD, WA, AK

May 21, 2025

**Via ECF**

The Honorable Victoria Reznik  
United States Magistrate Judge  
Southern District of New York  
300 Quarropas Street  
White Plains, NY 10601

Re: *The Wave Studio, LLC v. Trivago et al.*,  
No. 7:23-cv-03586  
*The Wave Studio, LLC v. General Hotel Management Ltd. et al.*,  
No. 7-13-cv-09239-CS-VR

Dear Judge Reznik:

We are counsel to Defendants ,Trip.com Group Limited, Trip.com, Travel Singapore Pte. Ltd., Skyscanner Ltd., and MakeMyTrip, Inc. (the “Trip Defendants”) in the above-captioned action and were substituted in as counsel to them in this action, with Court approval of this substitution, on May 9, 2025, twelve days ago.

We write to request a two-week extension of the deadline for the Trip Defendants on all pending motions in this action (the “Motions”) from May 23 to June 6, 2025. Trip Defendants seek this extension as they require additional time to confer with their counsel regarding a potential response or motion concerning the outstanding filings. Trip Defendants have conferred with Plaintiff in this matter, and Plaintiff has consented to the requested extension. (Exhibit 1) However, due to the time constraints, Trip Defendants were unable to obtain executed signatures in time for this filing. In addition, Trip Defendants have conferred with counsel for Booking.com. While Booking.com counsel appeared to be amenable to the extension, counsel advised that she needed to confer with her client. As of the time of filing, no response has been received. In light of the impending deadlines, Trip Defendants are proceeding with this filing.

We commit to making no further time-extension requests relating to the motions now pending beyond this one if our request is granted.

In conclusion, we respectfully request that the Court grant this request for two-week extension to the briefing schedule.

We appreciate the Court’s consideration of the issues discussed above.

Respectfully submitted,  
BALANCE LAW FIRM

*/s/ B. Robert Liu*

B. Robert Liu, Esq.  
Stephen M. Hudspeth, Esq.

Balance Law Firm  
1 World Trade Ctr Ste 8500  
New York, NY 10007  
(212) 741-8080  
robert.liu@balancelawfirm.com  
stephen.hudspeth@balancelawfirm.com

*Attorneys for Trip Defendants*

cc: Counsel of Record

The request is **GRANTED**, and the briefing schedule for all motions is extended to the following:

**6/6/2025** - Deadline for Defendants to reply to the motions to dismiss and for Defendants to oppose Plaintiff's cross-motion for leave to amend.

**6/20/2025** - Deadline for Plaintiff to reply to its cross-motion for leave to amend.

**6/23/2025** - Deadline for filing all motion papers on the docket.

The Clerk of Court is kindly directed to close the gavel associated with **ECF No. 513**.

SO ORDERED.



Hon. Victoria Reznik, U.S.M.J.

Dated: 5/22/2025